

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Ningbo Port Zhongdi Luggage)	
Manufacturing Limited)	
)	
Plaintiff,)	Case No. 1:24-cv-05031
)	
v.)	Dist. Judge LaShonda A. Hunt
)	
The Partnerships and)	Mag. Judge Young B. Kim.
Unincorporated Associations)	
Identified on Schedule “A”,)	
)	
Defendants.)	

41(a)(2)

Pursuant to Federal Rule of Civil Procedure 41(a)(2), Plaintiff, Ningbo Port Zhongdi Luggage Manufacturing Limited (“Plaintiff”), after reaching settlement agreement with Defendants, Costzon, GoplusUS, Gymax LLC, Honeyjoy, and Infans (collectively “Defendants”), respectfully request that this Honorable Court enter an order to dismiss this action with prejudice.

Under Federal Rule of Civil Procedure section 41(a)(2), court approval is required to voluntarily dismiss an action after an answer has been filed. Fed. R. Civ. Proc. 41(a)(1)(A)(i). In ruling on the motion, the Court may consider whether the requested dismissal is with or without prejudice, whether the court is being requested to maintain jurisdiction over the matter, and whether a dismissal without prejudice would unfairly affect the defendant by virtue of the loss of a preferred forum for the dispute, the right to a jury trial, or of some defense.

Here, Plaintiff and Defendants reach settlement. All parties agree to voluntarily dismiss this action. Thus, Plaintiff respectfully requests that this Honorable Court enter an order to dismiss this action in its entirety with prejudice.

Dated: November 16, 2024

Respectfully submitted,

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